

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

**DECLARATION OF DONNA
PRICE IN SUPPORT OF
CURLING PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Civil Action No. 1:17-CV-2989-AT

DONNA PRICE, declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Donna Price. I am an elector of the State of Georgia and a resident of DeKalb County. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

2. I hereby incorporate my previous declarations as filed in this case as if fully restated verbatim herein.

3. I am currently registered to vote in DeKalb County, Georgia.

4. I plan to vote on an absentee paper ballot in future elections, including in the March 24, 2020 presidential preference primary and in additional elections

taking place in 2020, so that I will know there is a verified, software-independent record of my vote.

5. In my capacity as director of Georgians for Verified Voting (“GAVV”), a nonpartisan organization that I founded in 2003 following concerns about the security of Georgia’s electronic voting system, I have gained considerable knowledge about election integrity issues and Georgia’s GEMS/DRE voting system.

6. I have learned of the extreme vulnerability of Georgia’s GEMS/DRE election system to undetectable errors and malicious tampering, and the failure of the system to provide a voter-verified mechanism, independent of software, for auditing the electronic results.

7. I have also learned of threats to the security, transparency, and verifiability of Georgia elections posed by implementation of the election system proposed by Dominion Voting Systems, Inc. and selected by the Georgia Secretary of State’s office (the “Proposed Election System”). The Proposed Election System calls for all in-person voting to be conducted on in-precinct scanners/tabulators that read summary paper records generated by electronic ballot-marking devices (“BMDs”) from which votes are tabulated using an unverifiable, non-human-readable 2D barcode.


8. Georgia voters, including myself, are expected to trust that our votes are secure and counted in the face of numerous threats and vulnerabilities in our system. I cannot read a 2D barcode, and so cannot verify upon voting that the BMD accurately recorded the votes I intend to cast on the paper ballot it produces. Accordingly, without a durable, software-independent, voter-verified record to audit, I have no confidence that the results of a given election conducted using the Proposed Election System will be accurate and reliable.

9. I understand that the Proposed Election System thus suffers from systemic vulnerabilities to advanced persistent threats, just as Georgia's GEMS/DRE election system does.

10. If Georgia conducts future elections on this Proposed Election System, I will be forced to vote on a system that I cannot reasonably trust to count my vote equally and fully, or to jump through additional bureaucratic hoops to vote using an absentee paper ballot, including requesting an absentee ballot by mail.

11. Were the Court to order that Georgia cannot implement and use the Proposed Election System, but must instead use hand-marked paper ballots for all voters who can hand mark, which a voter can review to verify that her votes are cast as intended and will be counted as cast, I would perceive less risk in casting my ballot in-person.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 4th day of October, 2019, in Atlanta, Georgia.



DONNA PRICE